

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
PERVAIZ QURESHI,

Plaintiff,
-against-

YURIY A. DRON, LARISA MAGALYUR
and FAST TRACK, LLC,

NOTICE FOR DISCOVERY
AND INSPECTION

Docket No.: 08 CV 00246

Defendants.

-----X
COUNSELOR:

PLEASE TAKE NOTICE, pursuant federal rules of civil procedure, you are required to produce to this office, within thirty (30) days of service hereof, the following:

1. Full name and last known address of the individual who came to the scene of your client's accident and his position and whether or not he is a doctor. The individual had picked up the brain as testified by your client, when your client was taken away in an ambulance.
2. Full and complete HIPPA compliant authorizations to obtain all of the medical records and reports including all diagnostic testing and recommendations by Dr. Elamir, Magsday, concerning any laminectomy or any treatment up to date of your client.
3. Full and complete HIPPA compliant authorizations to obtain duplicate originals of the MRI films taken of your client at Jacobi Medical Center, including the Ct Scans as well as all MRI films taken subsequent to the hospital admission specifically to your client's neck and back as a result of the August 2, 2006, accident.
4. Full and complete HIPPA compliant authorization to obtain the no fault records from Liberty Mutual Insurance Co., located at Park 80 Plaza East, Saddlebrook, New Jersey, 07662, claim no.: 5789957, policy no.: AB1331119383004T18.

5. Full and complete HIPPA compliant authorization to obtain all updated medical records and reports of the physical therapy treatment that your client was receiving, from Dr. Chennye, including all visits to the chiropractor there as well.
6. Full and complete HIOPPA compliant authorizations to obtain the pharmacy records concerning the Motrin, Naprocin and Selaxin, that your client took as a result of the injuries sustained from the accident, including the full name and last known address of the pharmacy dispensing said prescription.
7. Full name and last known address and also a HIPPA compliant authorization to obtain all of the prior records of Dr. Adubaker, that treated your client for Diabetes, including an authorization for the medication he took, Gluvance for the condition as well as any other doctor that treated him for this diabetic condition prior to August 2, 2006.

PLEASE TAKE NOTICE, that if the above is not forthcoming, a motion to compel its compliance will be made.

Dated: New York, New York
August 18, 2008



BY: FREDERICK D. SCHMIDT, JR.
LAW OFFICE OF JOHN P. HUMPHREYS
Attorneys for Defendants
485 Lexington Avenue, 7th Floor
New York, NY 10017
(917) 778-6600

TO:

OMRANI & TAUB, P.C.
Plaintiff Counsel
535 Fifth Avenue, 23rd Floor
New York, New York 10017
(212) 599-5550

STATE OF NEW YORK
COUNTY OF NEW YORK

AFFIDAVIT OF SERVICE
BY MAIL

I, MARIA PIZZO, being duly sworn, deposed and says that deponent is a secretary of the LAW OFFICE OF JOHN P. HUMPHREYS, attorneys for one of the parties herein; is over 18 years of age; is not a party to the action. The deponent served the papers noted below by regular mail, the same securely enclosed in the postage paid wrapper in the Letter Box maintained and exclusively controlled by the United States Postal Service at 485 Lexington Avenue, 7th Floor, New York, NY 10017; directed to the said attorney(s) at the address indicated below; that being the address within the state designated by said attorney(s) for that purpose, or the place where said attorney(s) then kept an office, between which places there then was and now is a regular communication by mail as follows:

Date mailed: August 18, 2008

Papers Served: NOTICE FOR DISCOVERY AND INSPECTION

TO:

OMRANI & TAUB, P.C.
Attorneys for Plaintiff
535 Fifth Avenue / 23rd Floor
New York, New York 10017
(212) 599-5550

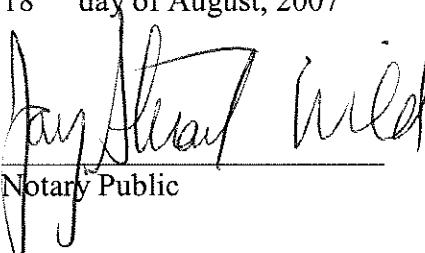


Maria Pizzo

MARIA PIZZO

Sworn to before me this

18TH day of August, 2007



Notary Public

JAY STUART WILD
Notary Public, State of New York
No. 01W14978093
Qualified in Queens County
Commission Expires 02/25/2007

2011

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Plaintiff,

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YURIY A. DRON, LARISA MAGALYUR
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NOTICE FOR DISCOVERY AND INSPECTION

Law Office of
JOHN P. HUMPHREYS

Attorneys for Defendant
**YURIY A. DRON, LARISA MAGALYUR AND
FAST TRACK, LLC**
Office & P.O. Address
485 Lexington Avenue, 7th Floor
New York, New York 10017

Tel. No.: (917) 778-6600
Fax No.: (917) 778-7020
(917) 778-7022

TO:

Service of a copy of the within _____ is hereby admitted.

Dated:

Attorney(s) for Defendants

NOTICE OF ENTRY:

PLEASE TAKE NOTICE that the within is a true copy of an order entered in office of the Clerk of the above Court on the _____ day of _____ 200 .

NOTICE OF SETTLEMENT:

PLEASE TAKE NOTICE that the within proposed order will be presented for settlement and entry at the Courthouse on the _____ day of _____ 200 , at 10:00 a.m. at the office of the Clerk of the Part of this Court where the within described motion was heard.

Dated: New York, New York

Law Office of
JOHN P. HUMPHREYS
Attorneys for Defendant(s)
As Designated Above